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**REMARKS**

Claims 1-31 are currently pending in the subject application, and claims 1-29 are presently under consideration. Favorable reconsideration of the subject application is respectfully requested in view of the following comments.

**I. Rejection of Claim 18 Under 35 U.S.C. §112, second paragraph**

Claim 18 stands rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicants regard as the invention. It is respectfully requested that this rejection be withdrawn for at least the following reason. Applicants' representative respectfully submits that the specification provides one of ordinary skill in the art the ability to ascertain the meaning of the term ("tier-agnostic") contended by the examiner. In particular, "tier" is conventional and well known, and therefore a detailed definition is not required. "What is conventional or well known to one of ordinary skill in the art need not be disclosed in detail." See *Hybritech Inc. v. Monoclonal Antibodies, Inc.*, 802 F.2d at 1384, 231 USPQ at 94. Furthermore, a definition of "agnostic," as recited in the subject claim, can be ascertained from the definition of transition-agnostic provided at page 11, lines 16-19. Accordingly, the rejection of the subject claim should be withdrawn.

**II. Rejection of Claims 1-3, 23-25, and 27-28 Under 35 U.S.C. §102(e)**

Claims 1-3, 23-25, and 27-28 stand rejected under 35 U.S.C. §102 (e) as being unpatentable over Okita, *et al.* (US 6,225,998 B1). It is respectfully submitted that this rejection be withdrawn for at least the following reason. Okita, *et al.* does not teach or suggest each and every element recited in the respective claims.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ 2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the...claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

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In particular, Okita, *et al.* does not teach or suggest *receiving a modification* to data, identifying workflow steps from a *table of workflow steps* based on the modification and/or invoking a workflow engine as recited in independent claims 1, 2 and 23. Okita, *et al.* merely teaches a system for *creating, modifying* and *displaying* graphical workflows by positioning graphical (visible or visual) workflow steps. (See col. 3, lines 17-18).

The system of Okita, *et al.* facilitates displaying visual primitives of a transaction flow through a transaction processing system. (Abstract). The system includes a graphical application workflow editor with a graphical user interface (GUI) for creation and/or modification of an application that is represented as a series of graphical steps. (See col. 3, lines 21-25). A user employs the GUI to graphically position a workflow step in a workflow during the creation and/or modification of the application. (See col. 3, lines 17-20).

In contrast, the claimed invention relates to a computing workflow system having process definition represented in a workflow table. (p. 1, lines 4-5). In particular, as set forth in independent claim 1, 2 and 23, the claimed methods include receiving a modification to data, identifying workflow steps from a table of workflow steps based on the modification, and, invoking a workflow engine. "[I]nput to a workflow client creates client events which may request data changes to a data table in a server. The workflow for a particular application is driven by these client events. Every time a data change to the data table is requested, the workflow engine is invoked to enforce transition rules." (p. 13, lines 3-6).

Thus, Okita, *et al.* teaches *user creation* and/or *modification* of a graphical workflow via positioning graphical workflow steps utilizing a GUI, and does not teach or suggest *receiving a modification* to data as in the claimed invention. Okita, *et al.* discloses that a computer system utilized with the graphical application workflow editor can be modified to various configurations; however, the modifications pertain to the number, size and type of *computer components*, and do not relate to *receiving a modification* to data as claimed in the subject invention. (See col. 3, lines 16-29).

Furthermore, Okita, *et al.* does not teach or suggest a *table* of workflow steps as claimed. Instead, Okita, *et al.* teaches utilizing *visual steps* (primitives) of a transaction flow. (See col. 4, lines 64 – col. 5, line 3). The visual steps can be employed in a workflow diagram, wherein the diagram of visual steps is then serialized or compiled into a series of routing instructions that may be stored in a routing table. Hence, Okita, *et al.* teaches a *routing* table of *instructions* of

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compiled *visual* steps of a transaction flow, not a table of workflow steps as claimed.

Moreover, Okita, *et al.* does not teach or suggest invoking a workflow engine to *enforce state transitions* in the process based on the table of workflow steps. Okita, *et al.* teaches *expression evaluation steps*, wherein an arithmetic and Boolean operation can be performed and the result can be assigned to a variable and returned. (See col. 12, lines 12-23). However, a workflow engine is not invoked to evaluate expressions, and the evaluation of an expression does not enforce a state transition. Furthermore, Okita, *et al.* discloses saving a workflow state (the current graphical arrangement of workflow steps) before an editing operation merely to support undo and redo commands during the creation and/or modification of an application. (See col. 8, lines 23-32). Okita, *et al.* is silent regarding enforcing state transitions.

In view of the above, it is respectfully submitted that the rejection of independent claims 1, 2 and 23 (and claims 3, 24-25, and 27-28, which depend therefrom) be withdrawn.

### III. Rejection of Claim 26 Under 35 U.S.C. §103(a)

Claim 26 stands rejected under 35 U.S.C. §103(a) as being obvious over Okita, *et al.* (US 6,225,998 B1). It is respectfully submitted that this rejection be withdrawn for at least the following reason. Okita, *et al.* does not teach or suggest all the claim limitations of the subject claims.

To reject claims in an application under §103, an examiner must establish a *prima facie* case of obviousness. A *prima facie* case of obviousness is established by a showing of three basic criteria. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. See MPEP §706.02(j).

Claim 26 depends from independent claim 23, and as noted *supra*, Okita, *et al.* does not teach or suggest all the limitations of claim 23. Accordingly, this rejection should be withdrawn.

### IV. Rejection of Claims 4-9, 11-20 and 29 Under 35 U.S.C. §102(e)

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Claims 4-9, 11-20 and 29 stand rejected under 35 U.S.C. § 102(e) as being unpatentable over Okita, *et al.* (US 6,225,998 B1) in view of Hoffecker, *et al.* (US 5,325,505). It is respectfully submitted that this rejection be withdrawn for at least the following reason.

MPEP § 2131.01 provides, in pertinent part: “[n]ormally, only one reference should be used in making a rejection under 35 U.S.C. 102.” Anticipating that the Examiner would issue a rejection of these claims under 35 U.S.C. § 103 in a future Office Action, it is respectfully submitted that Okita, *et al.* and Hoffecker, *et al.*, individually and/or in combination, do not teach or suggest all the claim limitations of the subject claims.

Claims 4-9, 11-20 and 29 recite similar limitations as independent claims 1, 2 and 23, and Hoffecker, *et al.* fails to make up for the aforementioned deficiencies of Okita, *et al.* regarding teaching and/or suggesting a *workflow table* of workflow steps as claimed. Additionally, Okita, *et al.* and Hoffecker, *et al.*, alone and in combination, do not teach or suggest a *server database having a data table and associated workflow table*, a *workflow extended store* and a *script engine* as recited in independent claims 4, 11, 17 and 29.

Okita, *et al.* discloses one or more remote computer systems capable of executing applications on a server. (See col. 4, lines 59-63). However, Okita, *et al.* does not teach or suggest a server with a *data table* and associated *workflow table* of workflow steps as claimed. Furthermore, the teachings of Okita, *et al.* limit the server(s) to *remote* computer systems, whereas the claimed workflow system *includes* a server database having a data table and an associated workflow table. Regarding a workflow extended store, the examiner states that Okita, *et al.* fails to teach or suggest the claimed workflow extended store. (See Office Action, page 9, last paragraph).

Moreover, Okita, *et al.* *teaches away* from employing a script engine. Okita, *et al.* discloses utilizing a GUI (from the application workflow editor previously noted) with visual steps that is “easier to interpret than scripting languages or textual listings of steps.” (See col. 3, lines 27-29). Therefore, employing a script engine with Okita, *et al.* would make it *more difficult* to create, modify and display workflows.

Hoffecker, *et al.* merely teaches a storage manager employed by an expert system to *manage* computer system data *storage*. (See Abstract). Hoffecker, *et al.* teaches employing extended memory as a data storage unit, however the extended memory (and other “fast” memory such as cache) is utilized for data that is frequently accessed by a computer system to

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achieve *high-speed access* to the frequently utilized data. The most infrequently utilized data is stored on slower tape cartridges. (See col. 1, lines 28-39). In contrast, the claimed workflow extended store is employed to launch a workflow engine. After a data modification request is received, a data table initiates a trigger that is transmitted to a workflow extended store. (See page 9, line 28 – page 10, line 3). The trigger invokes an extended store procedure, which launches a workflow engine. (See page 10, lines 11-15).

From the above, it is readily apparent that the subject claims are not obvious over Okita *et al.* in view of Hoffecker, *et al.*, and therefore, it is respectfully submitted that the rejection to claims 4-9, 11-20 and 29 be withdrawn.

**V. Rejection of Claims 21 and 22 Under 35 U.S.C. §102(e)**

Claims 21 and 22 stand rejected under 35 U.S.C. § 102(e) as being unpatentable over Okita, *et al.* (US 6,225,998 B1) in view of Hoffecker, *et al.* (US 5,325,505) and further in view of Flores, *et al.* (US 6,073,109). It is respectfully submitted that this rejection be withdrawn for at least the following reason.

MPEP § 2131.01 provides, in pertinent part: “[u]nformally, only one reference should be used in making a rejection under 35 U.S.C. 102.” Anticipating that the Examiner would issue a rejection of these claims under 35 U.S.C. § 103 in a future Office Action, it is respectfully submitted that Okita, *et al.*, Hoffecker, *et al.*, and Flores *et al.* individually and/or in combination, do not teach or suggest all the claim limitations of the subject claims.

Flores, *et al.* fails to make up for the aforementioned deficiencies of Okita, *et al.* and Hoffecker, *et al.* with respect to independent claim 17, which claims 21 and 22 depend from. Flores, *et al.* merely teaches a system for *analyzing and structuring business processes* to provide businesses with tools to manage business processes. (See col. 1, lines 19-22). Therefore, withdrawal of the rejection to claims 21 and 22 is respectfully submitted.

**VI. Rejection of Claim 10 Under 35 U.S.C. §102(e)**

Claim 10 stands rejected under 35 U.S.C. § 102(e) as being unpatentable over Okita, *et al.* (US 6,225,998 B1) in view of Hoffecker, *et al.* (US 5,325,505) and further in view of Grooters (US 6,412,031 B1). It is respectfully submitted that this rejection be withdrawn for at least the following reason.

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MPEP § 2131.01 provides, in pertinent part: "[n]ormally, only one reference should be used in making a rejection under 35 U.S.C. 102." Anticipating that the Examiner would issue a rejection of these claims under 35 U.S.C. § 103 in a future Office Action, it is respectfully submitted that Okita, *et al.*, Hoffecker, *et al.*, and Grooters *et al.* individually and/or in combination, do not teach or suggest all the claim limitations of the subject claims.

Claim 10 depends from claim 4, and Grooters does not make up for the aforementioned deficiencies of Okita, *et al.* and Hoffecker, *et al.* regarding independent claim 4. Grooters teaches a system for allowing several applications to share a single *video overlay resource* via multiplexing, and does not relate to the claimed invention. (See abstract). Accordingly, the rejection to claim 10 should be withdrawn.

#### CONCLUSION

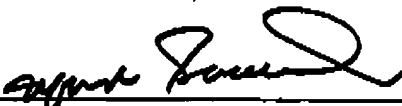
The present application is believed to be condition for allowance in view of the above amendments and comments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063.

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicant's undersigned representative at the telephone number listed below.

Respectfully submitted,

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